

LAW OFFICES OF
NICHOLAS A. MATTERA
470 Chamberlain Avenue
Paterson, New Jersey 07522
(973) 595-6240
Attorney for Plaintiff
My File No.: 8403
Attorney Id. #021091981

ANGEL ORDONEZ, Plaintiff(s), vs. BRENDAN BOWMAN, YORK PENSKE, WYCHE TRUCKING, WYCHE TRUCKING, LLC, WYCHE TRUCKING, INC. and/or JOHN DOE I-V (a fictitious name), Defendant(s).	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: PASSAIC COUNTY DOCKET NO.: CIVIL ACTION <u>COMPLAINT AND JURY DEMAND</u>
--	---

Plaintiff, Angel Ordonez, residing in the City of Paterson, County of Passaic and State of New Jersey, by way of Complaint against the Defendants, says:

FIRST COUNT

1.) On or about September 8, 2021, the Plaintiff, Angel Ordonez, was the operator of a motor vehicle which was lawfully traveling on Minnisink Road turning left onto Riverview Drive in the Borough of Totowa, County of Passaic and State of New Jersey.

2.) At the time and place aforesaid and at all times hereinafter mentioned, a vehicle owned and/or leased by Defendants, Wyche Trucking and/or Wyche Trucking, LLC and/or Wyche Trucking, Inc. and/or York Penske and/or John Doe I-V (a fictitious name), and operated by Defendant, Brendan Bowman, with permission and consent and as agent, servant and/or

-2-

employee, was travelling besides Plaintiff's vehicle turning left from Minnisink Road onto Riverview Drive in the Borough of Totowa, County of Passaic and State of New Jersey.

3.) At the aforesaid time and place, the Defendant, Brendan Bowman, was careless and negligent in the operation of said vehicle in that he failed to make proper observation; failed to operate his vehicle in a prudent, careful, reasonable manner; failed to maintain proper control; failed to maintain a safe travelling and braking speed; failed make a safe proper left turn; failed to stay in his proper lane; improperly veered into Plaintiff's lane; failed to properly maintain proper control of his vehicle under the existing condition and/or failed to yield the right of way and failed to proceed with due care, which negligence caused his vehicle to collide with Plaintiff's vehicle.

4.) As a direct and proximate result of the negligence and carelessness of the Defendants, Brendan Bowman, Wyche Trucking and/or Wyche Trucking, LLC and/or Wyche Trucking, Inc. and/or York Penske and/or John Doe I-V (a fictitious name), as aforesaid the Plaintiff, Angel Ordonez, was caused to sustain serious, severe and permanent injuries which have caused the Plaintiff permanent pain and suffering, prevented him from his normal, daily activities and caused him to incur bills for medical treatment and will in the future cause him serious, permanent injuries, permanent pain and suffering, prevent him from pursuing his normal, daily activities and cause him to incur bills for medical treatment.

-3-

WHEREFORE, Plaintiff, Angel Ordonez, demands judgment against Defendants, Brendan Bowman and/or Wyche Trucking and/or Wyche Trucking, LLC and/or Wyche Trucking, Inc. and/or York Penske and/or John Doe I-V (a fictitious name), jointly, severally and/or in the alternative for damages together with interest and costs.

SECOND COUNT

1.) Plaintiff, Angel Ordonez, repeats, realleges, reaffirms each and every allegation of the first count of the Complaint as it is set forth at length herein.

2.) On or about September 8, 2021 and at all times mentioned here in Plaintiff, Angel Ordonez, was the owner and operator of a 2002 Toyota.

3.) As a direct and proximate result of the combined negligence and carelessness of Defendants as aforesaid stated Plaintiff's vehicle was severely damaged and depreciate din value and Plaintiff has been caused damages for its repair, replacement, alternative means of transportation, and depreciation.

WHEREFORE, Plaintiff, Angel Ordonez, demands judgment against Defendants, Brendan Bowman and/or Wyche Trucking and/or Wyche Trucking, LLC and/or Wyche Trucking, Inc. and/or York Penske and/or John Doe I-V (a fictitious name), jointly, severally and/or in the alternative for damages together with interest and costs.

DATED: June 14, 2022

BY 
NICHOLAS A. MATTERA, ESQ.
Attorney for Plaintiff

-4-

JURY DEMAND

Plaintiff herein demands trial by jury of six (6) on all issues so triable.

DATED: June 14, 2022

BY: 
NICHOLAS A. MATTERA, ESQ.
Attorney for Plaintiff

CERTIFICATION

I, **NICHOLAS A. MATTERA, ESQ.**, hereby certify that to the best of my knowledge the matter in controversy is not the subject matter of any other action pending in any Court or pending arbitration proceeding. Nicholas A. Mattera, Esq. is aware of injuries to the passenger in Plaintiff's vehicle likely to be subject of a future Complaint.

The Certification is made pursuant to Rule 4:5-1 and I understand that if any statements made by me are willfully false, I may be subject to punishment.

DATED: June 14, 2022

BY: 
NICHOLAS A. MATTERA, ESQ.
Attorney for Plaintiff